## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

		REDENCED
In the Matter of	<b>QOCKET FILE COPY ORIGINAL</b>	APR - 8 1996
	FEDEHAL COMPLETION	
Revision of	)	OFFICE OF SEGRETARY
Filing Requirements	) CC Docket No.	96-23
	)	

## COMMENTS OF ALLTEL TELEPHONE SERVICES CORPORATION

ALLTEL Telephone Services Corporation, on behalf of its affiliated local exchange telephone companies (hereinafter "ALLTEL"), respectfully submits its comments on the Notice of Proposed Rulemaking ("NPRM"), released on February 27, 1996, in the above captioned matter. For the reasons discussed herein, ALLTEL generally supports the Commission's proposals and further suggests that the Commission consider adopting necessary rule changes to provide some linkage between the period covered by the rate of return monitoring reports and the annual interstate access tariff filings.

In the NPRM, the Commission has requested comments on the proposed elimination of thirteen common carrier reporting requirements and a reduction in the frequency of complying with six other reporting requirements. It appears that the NPRM is an outgrowth of the Commission's earlier review of certain reporting requirements that were adopted during the time of the AT&T divestiture and as part of the President's 1993 Regulatory Reform Initiative.

With respect to the thirteen reporting requirements that may be eliminated, the one of most importance to ALLTEL relates to the filing on an as-needed basis of a list of billing and collection contracts by local exchange carriers. ALLTEL supports the elimination of the filing of this information.

Insofar as the Commission's proposal to reduce the frequency of six other reporting requirements, ALLTEL's direct concern relates to the proposed change in the frequency of filing the interstate access earnings monitoring report, FCC Form 492, from a quarterly to an annual basis. ALLTEL supports the Commission's proposal to require the filing of this report on an annual basis rather than on a quarterly basis. However, ALLTEL believes that the text of the Commission's proposed rule change needs to be further revised to reflect the Commission's intent

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that rate of return monitoring reports will only be due on an annual basis.

Under the changes proposed by the Commission and the text that will continue to remain in Section 65.600(b), it appears that reference to "quarterly" reports will continue to exist in some places and that the substitution of "after the end of each calendar half year" will not reflect the Commission's intent that rate of return reports be filed on an annual basis. Thus, ALLTEL believes that the word "annual" should be substituted for the word "quarterly" in Section 65.600(b).

ALLTEL believes that the proposed change in reporting requirements is a positive first step. However, ALLTEL believes that it will not remedy the current lack of linkage between the two year rate of return monitoring period (which runs from January 1st in odd-numbered years and ends on December 31 in even-numbered years) and the period covered by the annual access tariff filings of rate of return companies, such as ALLTEL, which runs from July 1st to June 30th. Thus, in order for this linkage to exist, ALLTEL believes the Commission should consider revising the annual access tariff filing period to coincide with the time period covered by the interstate rate of return monitoring reports.

In summary, ALLTEL supports the Commission's proposals set forth in the NPRM, together with the revisions or modifications proposed herein, and commends the Commission's responsiveness in addressing rule revisions which will result in regulatory streamlining and reform.

Respectfully submitted, ALLTEL Telephone Services Corporation

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April 8, 1996

## **CERTIFICATE OF SERVICE**

I, Sondra Spottswood, do certify that on April 8, 1996, Comments of ALLTEL Telephone Services Corporation were either hand-delivered, or sent U.S. Mail, first-class, postage prepaid, to the following persons.

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